

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re: GREGORY MICEK**

**Debtor**

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**Case No. 20-32441-H5-11**

**Chapter 11**

**DEBTOR'S EMERGENCY MOTION TO CONTINUE CONFIRMATION HEARING**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU.**

**IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

TO THE, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Gregory Micek (the "Debtor"), Debtor and Debtor-in-Possession, and files this Emergency Motion to continue the confirmation hearing set for April 29, 2021, and in support thereof would show this Court as follows:

**I.**

**Relief Requested**

1. Gregory Micek is married to Nancy Micek. Over the weekend of April 25, 2021, the mother of Nancy Micek died.
2. Debtor has a confirmation hearing set for April 29, 2021.

3. At this time, the Debtor anticipates that the funeral for his wife's mother will be on April 29, 2021.

4. Due to the death of his wife's, the Debtor seeks a short continuation of the confirmation hearing set for April 29, 2021, for approximately 2 weeks.

5. The Debtor anticipates or hopes to resolve the objections to confirmation. The illness of the mother of Nancy Micek has impacted the ability to finalize issues recently.

6. Counsel for both Specialized Loan Servicing (the first lienholder) and Wells Fargo (the second lienholder) are not opposed to a short (approximately 2 week) continuation of the confirmation hearing.

WHEREFORE, PREMISES CONSIDERED the Debtor requests that this Court continue the confirmation hearing for approximately 2 weeks from April 29, 2021 and for such other and further relief as to which the Debtor is entitled.

DATED: April 26, 2021

Respectfully submitted,

By: /s/ Reese W. Baker  
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ATTORNEYS FOR DEBTOR

#### **CERTIFICATE OF NEED FOR EMERGENCY RELIEF**

The undersigned hereby certifies that emergency relief is needed. The death of the debtor's wife's mother has adversely affected the ability of the Debtor to address and finalize issues for the plan

confirmation hearing.

*/s/ Reese W. Baker*

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Reese W. Baker

**CERTIFICATE OF CONFERENCE**

Counsel for the Debtor has conferred with counsel for Specialize Loan Servicing (Chandra Pryor) and counsel for Wells Fargo (Yoshie Valadez). The counsel have indicated they have no opposition to the motion to continue.

*/s/ Reese W. Baker*

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Reese W. Baker

**Certificate of Service**

I certify that on April 26, 2021, I caused a copy if the foregoing documents to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Reese W. Baker*

Reese W. Baker